2.3 Surrounding Receptors

Public water is available to the site area. However, Portland Water District records for South Windham indicate that a number of residences generally east of the site have private water supply wells. The closest wells to the site include the Boulanger, Georgatos and Reed residences, located about 500 to 1,000 feet to the northeast. Site topography indicates these residences are located at an elevation 20 to 40 feet higher than the site and are likely upgradient with respect to groundwater flow.

The Presumpscot River borders the site to the west, and properties to the north, east and south consist of a mix of commercial, industrial and residential properties. The closest residence to the site is an abutting apartment building about 300 feet east of the mill building. Ransom has identified no schools, playgrounds or day care facilities within 500 feet of the Site.

3.0 SITE CHARACTERIZATION BY RANSOM

Based on the results of the prior Site investigations, Ransom conducted additional characterization of materials inside the mill building for PCBs. The sampling program included the following:

1. Collection of surface wipe samples from tile floors on the first and second floors of the former office building and surface wipe samples from the concrete floor in a stockroom on the second floor of the former office building.

2. Collection of bulk samples of sludge and dirt/debris on top of concrete floors on the ground level and first floor of the mill building, the first floor Storage and Manufacturing area and Press Building (ground floor);

3. Collection of bulk samples of oily sludge/residue from the concrete floor and walls on the ground floor, and from the boiler area on the first floor of the mill building;

4. Collection of exposed soils where concrete had been broken in the vicinity of two transformers (in storage) on the first floor of the mill building; and

5. Collection of wood chips from oil-stained wood in the vicinity of electrical equipment on the ground and first floors of the mill building.

The samples collected during Ransom's investigation were analyzed by Pace Analytical, Inc. (Pace) of Pittsburgh, PA for PCBs by U.S. EPA Method 8082. Bulk samples were extracted using US EPA Method 3540 (Soxhlet Extraction). The sample results are summarized on Table 1; Laboratory data sheets are provided in Appendix B.

3.1 Surface Wipe Samples

Ransom collected three surface wipe samples (IW-01 through IW-03) from tile floors on the first and second floors of the former office building and the concrete floor in a stockroom on the second floor of the former office building on October 27, 2005. Each sample was collected in accordance with the standard wipe test as defined by §761.123. Wipe sampling locations are depicted on Figure 3.

PCBs were not detected in wipe samples IW-02 and IW-03. Aroclor 1254 and Aroclor 1260 were detected at a total concentration of 43 µg/100 cm^2 in IW-01. This concentration is below the clean-up standard for non-porous surfaces in Low Occupancy Areas of 100 µg/100 cm^2 in accordance with §761.61(a)(4)(iii)

3.2 Bulk Samples of Sludge, Dirt, and Debris

Ransom collected eight samples of sludge and dirt/debris on top of concrete floors and walls on the ground and first floor levels of the Melt Building (IS-10, IS-11 and IS-14), the ground and first floors of the Storage and Manufacturing area (IS-01, IS-02, IS-05 and IS-06), and the ground floor of the Press Building (IS-08) on October 27 and November 2, 2005 (refer to Figures 2 and 3).

Total PCBs were detected at concentrations ranging from non-detect in the Press Building (IS-08) to 320 mg/kg on the first floor of the Storage and Manufacturing area (IS-02). Four of the eight samples contained total PCBs with concentrations greater than 50 mg/kg. The PCBs detected were Aroclor 1248,

1254 and 1260.

3.3 Bulk Samples of Oily Sludge

Ransom collected three samples of oily sludge from the ground floor wall (concrete) of the Melt Building (IS-03), the concrete floor of the melt building (IS-04) beneath a fuel distribution line that had dripped oil to the floor, and near the boiler in the Storage and Manufacturing area (IS-07). The samples were collected on October 27; the locations are shown on Figures 2 and 3.

Total PCBs in the oily sludge were detected at concentrations ranging from 1.8 (IS-07) to10 mg/kg (IS-04). PCB constituents included Aroclor 1242 and Aroclor 1254.

3.4 Bulk Soil Sample

Ransom collected one bulk soil sample (IS-05) from an area of broken concrete flooring in the Storage and Manufacturing area on October 27, 2005. The sample location is shown on Figure 2.

The soil sample contained total PCBs at a concentration of 97 mg/kg. The constituents were Aroclor 1254 (66 mg/kg) and Aroclor 1260 (31 mg/kg).

3.5 Bulk Wood Samples

Ransom collected two samples of oil-stained wood in transformer areas, one from a platform in the former generator room (IWD-02), ground floor, and one from a platform on the first floor of the Melt Building (IWD-01). Sample locations are shown on Figures 2 and 3.

The two wood chip samples contained total PCBs of 37 mg/kg (IWD-01) and 100 mg/kg (IWD-02). Aroclor 1242, 1254 and 1260 were identified.

3.6 Data Usability/Validation

To assess the usability/validity of the laboratory data obtained during the investigation work described above, Ransom conducted a limited data validation assessment. This assessment included an evaluation of the following parameters as provided in the laboratory reports:

1. Sample integrity;
2. Laboratory information;
3. Chain of custody;
4. Laboratory report details; and
5. Quality Assurance/Quality Control.

During the validation process, Ransom reviewed the laboratory analytical reports and completed a Laboratory Report Checklist documenting the performance of the validation. Ransom did not identify laboratory quality-control issues that may have had an adverse impact on the usability of the data.

3.7 Determination of PCB Remediation Waste

The concentration of PCBs in bulk materials sampled inside the mill building to date range from non-detect to 570 mg/kg. Ten of the eighteen samples collected exhibited total PCB concentrations greater than 50 mg/kg. The source of PCBs at the site is likely a combination of spills and leaks of PCB-MODF from transformer and other electrical equipment, PCB-containing lubricating/hydraulic oils and PCB-contaminated fuel oil. Given uncertainty of the source, date of use and original concentration of PCBs in equipment in the mill building, sludge, dirt/debris and oily material on the floors and walls of the mill building will be presumed to be "PCB Remediation Wastes."

3.8 Quantity of PCB Remediation Waste

The quantity of PCB remediation waste has been estimated based on visual assessment of approximate material thickness and square footage of areas covered with sludge, dirt/debris and oily material. The table below summarizes the estimates.

Location	**Estimated Impacted Area (sq. ft.)**	**Estimated Thickness (in)**	**Estimated Volume (cubic yards)**
Maintenance Shop Area	4,200	0.5	6.5
Melt Building- ground	10,000	0.5	15
Melt Building – 1st	10,000	0.5	15
Storage & Manufacturing – ground	6,000	0.25	4.7
Storage & Manufacturing – 1st	6,000	0.25	4.7
Generator Room	400	0.25	0.3
		Estimated Total (cubic yards)	46.2

Specific PCB-contaminated locations are not delineated on the site plans due to the virtual ubiquitous presence of these materials within the mill building. As a result, sludge, dirt/debris and oil material encountered in the mill building will be presumed contaminated with PCBs (>1 ppm) and will be removed for proper disposal at a PCB disposal facility. The only areas of the mill not proposed for PCB clean-up are the former offices (2nd floor, Figure 3) where wipe testing of floors indicated concentrations of PCBs below clean-up standards (refer to Section 3.1), and the Press Building (ground floor, Figure 2) where bulk sample testing identified no PCBs.

4.0 CLEANUP PLAN

4.1 Objective

The objective of the cleanup activities conducted under this Plan is to remove sludge, dirt/debris and oily material from the concrete flooring and walls of the former mill building. Following removal of this material, additional characterization of underlying concrete and soils will be conducted, and self-implementation plans will be submitted to EPA for subsequent mitigation. The mill building is proposed to be demolished for site redevelopment.

4.2 Cleanup Goal

It is assumed that sludge, dirt/debris and oily material identified in the mill building contains PCB concentrations greater than 1 mg/kg. Accordingly, this material will be collected and properly disposed as PCB Remediation Waste.

4.3 Public Notification

Ransom will notify the U.S. EPA, MEDEP, and the Windham Health Department regarding the performance of the work prior to implementation of the Plan.

4.4 Necessary Permits

Ransom has submitted a Voluntary Response Action Plan to MEDEP and has received approval for site mitigation. Ransom has identified no other permit requirements.

4.5 Sludge, dirt/debris and Oily Material Removal

Ransom will be on-site to oversee contractor removal of sludge, dirt/debris and oily material from the mill building. Depending on the consistency of the material, PCB waste will be recovered using either a vacuum equipped with a HEPA-filter, or by shoveling into storage containers (*e.g.*, hardened sludge and oily materials). Dust suppression, such as application of a spay mist, will be implemented on an as-needed basis.

For oil-stained concrete surfaces, the contractor will apply a petroleum-based agent (*e.g.*, #2 fuel oil) to assist in removing residual PCB contamination. Applied liquids and residuals will be contained with plastic sheeting and absorbent pads.

Collected materials will be stored in labeled 55-gallon drums or roll-off containers. The containers will be kept closed except during transfer of waste to the containers. Used HEPA filters and containment materials (*i.e.*, plastic sheeting, tape, lumber) will be managed as PCB Remediation Waste. Following appropriate waste characterization activities, the PCB Remediation Waste is scheduled to be disposed at The Environmental Company Michigan Disposal Waste Treatment Plant in Belleville, Michigan.

Fuel distribution piping was found to contain concentrations of total PCBs greater than1 ppm, but less than 50 ppm. This piping will be disassembled, the ends of the pipes capped, then disposed at a licensed Special Waste landfill in Maine (*e.g.*, Sawyers in Hamden, or Crossroads special waste landfill in Norridgewock) following characterization in accordance with the Special Waste landfill permit requirements.

4.6 Confirmatory Sampling and Cleanup Verification

Following the removal of the PCB-contaminated sludge, dirt/debris and oily materials from the mill building, Ransom will conduct sampling of the underlying concrete to assess the potential for residual PCBs. Samples will be collected in visibly stained areas and other locations where PCBs were identified during bulk sample characterization. Sampling will be conducted in accordance with §761.265, "Sampling Bulk PCB Remediation Waste and Porous Surfaces." If PCBs are identified at concentrations greater than 1 mg/kg, a plan for mitigation of the concrete will be prepared and submitted to EPA.

4.7 Contingencies

The proposed PCB mitigation plan is inherently conservative in that virtually all sludge, dirt/debris and oil materials encountered within the mill building is assumed to be PCB Remediation Waste with total PCB concentrations >50 ppm (the excluded areas being the former offices and Press Building). The greatest uncertainty is the volume of the material that will be collected, stored and disposed off site. Our client and the contractor are prepared to collect and properly dispose of additional PCB Remediation Waste if actual volumes exceed the estimates detailed herein.

5.0 PROPOSED IMPLEMENTATION SCHEDULE

Ransom proposes the following implementation schedule for the Plan:

Activity	Completion Date
Submittal of Plan	November 23, 2005
US. EPA Approval (expected)	December 23, 2005
Interior Building Material Removal	January-February 2005

TABLES

TABLE 1: PCB Sample Results
Interior of Keddy Mill
South Windham, Maine

	Sample Identifier	IW-01	IW-02	IW-03	IWD-01	IWD-02	IS-01	IS-02	IS-03	IS-04	IS-05	IS-06
	Sample Type	Wipe	Wipe	Wipe	Wood	Wood	Sludge/ Solids	Sludge/ Solids	Sludge/ Solids	Sludge/ Solids	Sludge/ Solids	Sludge/ Solids
	Location	2nd floor, Manufacturing and Office	2nd floor, Manufacturing and Office	2nd floor, Manufacturing and Office	1st floor, Melt Building	Ground floor, Forge Shop	1st floor, Storage & Manufacturing	1st floor, Storage & Manufacturing	Ground floor, Melt Building wall	Ground floor, Melt Building, beneath pipe cutoff	Ground floor, Storage & Manufacturing, cut out	Ground floor, Storage & Manufacturing
	Result Units	µg	µg	µg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
PCBs	Collection Date	27-Oct-05	27-Oct-05	27-Oct-05	27-Oct-05	2-Nov-05	27-Oct-05	27-Oct-05	27-Oct-05	27-Oct-05	27-Oct-05	27-Oct-05
Aroclor-1016		<5.0	<5.0	<5.0	<2.2	<7.0	<4.5	<41	<1.0	<1.1	<3.9	<5.3
Aroclor-1221		<5.0	<5.0	<5.0	<2.2	<7.0	<4.5	<41	<1.0	<1.1	<3.9	<5.3
Aroclor-1232		<5.0	<5.0	<5.0	<2.2	<7.0	<4.5	<41	<1.0	<1.1	<3.9	<5.3
Aroclor-1242		3 J	<5.0	<5.0	17	71	<4.5	<41	3.6	1.7	<3.9	<5.3
Aroclor-1248		<5.0	<5.0	<5.0	<2.2	<7.0	<4.5	<41	<1.0	<1.1	<3.9	35
Aroclor-1254		24	<5.0	<5.0	12	34	89	320	3.2	8.5	66	62
Aroclor-1260		17	<5.0	<5.0	7.9	<7.0	<4.5	<41	<1.0	<1.1	31	27
PCB Total		**43**	<5.0	<5.0	**37**	**100**	**89**	**320**	**6.7**	**10**	**97**	**120**

Notes:
NA = Not available
µg = microgram
mg/kg = milligram per killigram
MDEP = Maine Department of Environmental Protection
PCBs = Polychlorinated Biphenyls
Bold values indicate exceedance of guideline
J = Estimated value

TABLE 1: PCB Sample Results
Interior of Keddy Mill
South Windham, Maine

	Sample Identifier	IS-07	IS-08	IS-09	IS-10	IS-11	IS-14	IS-13	Equip. Blank	SS101A	SS101B	SS102	SS103	SS104	SS5
	Sample Type	Sludge/ Solids	Sludge/ Solids	Solids	Sludge/ Solids	Sludge/ Solids	Sludge/ Solids	Sludge/ Solids	Aqueous	Soil/Solids	Soil/Solids	Soil/Solids	Soil/Solids	Soil/Solids	Soil/Solids
	Location	Ground floor, Press Building	Ground floor, Press Building, pit	Ground floor, adjacent to main stairs	1st floor, Melt Building	1st floor, Melt Building	1st floor, Melt Building	Duplicate of IS-09 (ground floor)	Rinsate Blank	Ground floor, floor sump (split sample)	Ground floor, floor sump (split sample)	Ground floor, soil on floor	Ground floor, soil on floor, Melt Building	Ground floor, soil on floor	Ground floor
	Result Units	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	µg/l	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
PCBs	Collection Date	27-Oct-05	27-Oct-05	2-Nov-05	27-Oct-05	2-Nov-05	2-Nov-05	2-Nov-05	27-Oct-05	13-Jan-04	13-Jan-04	13-Jan-04	13-Jan-04	13-Jan-04	25-Nov-03
Aroclor-1016		<1.0	<1.0	<1.0	<6.0	<3.4	<5.2	<1.0	<1.0	<4.41	<31	<6.68	<29.8	<29.9	< 39.2
Aroclor-1221		<1.0	<1.0	<1.0	<6.0	<3.4	<5.2	<1.0	<1.0	<4.41	<31	<6.68	<29.8	<29.9	< 39.2
Aroclor-1232		<1.0	<1.0	<1.0	<6.0	<3.4	<5.2	<1.0	<1.0	<4.41	<31	<6.68	<29.8	<29.9	< 39.2
Aroclor-1242		<1.0	<1.0	<1.0	<6.0	<3.4	<5.2	<1.0	<1.0	<4.41	<31	<6.68	<29.8	<29.9	< 39.2
Aroclor-1248		<1.0	<1.0	2.2	<6.0	15	<5.2	2	<1.0	<4.41	<31	<6.68	<29.8	<29.9	< 39.2
Aroclor-1254		1.8	<1.0	3.6	41	39	27	2.9	<1.0	262	570	71.1	138	100	45
Aroclor-1260		<1.0	<1.0	<1.0	<6.0	15	<5.2	<1.0	<1.0	<4.41	<31	<6.68	<29.8	<29.9	32
PCB Total		1.8	<1.0	**5.8**	**41**	**69**	**27**	**4.9**	<1.0	**262**	**570**	**71.1**	**138**	**100**	**77**

Notes:
NA = Not available
µg = microgram
mg/kg = milligram per kilogram
MDEP = Maine Department of Environmen
PCBs = Polychlorinated Biphenyls
Bold values indicate exceedance of guideli
J = Estimated value

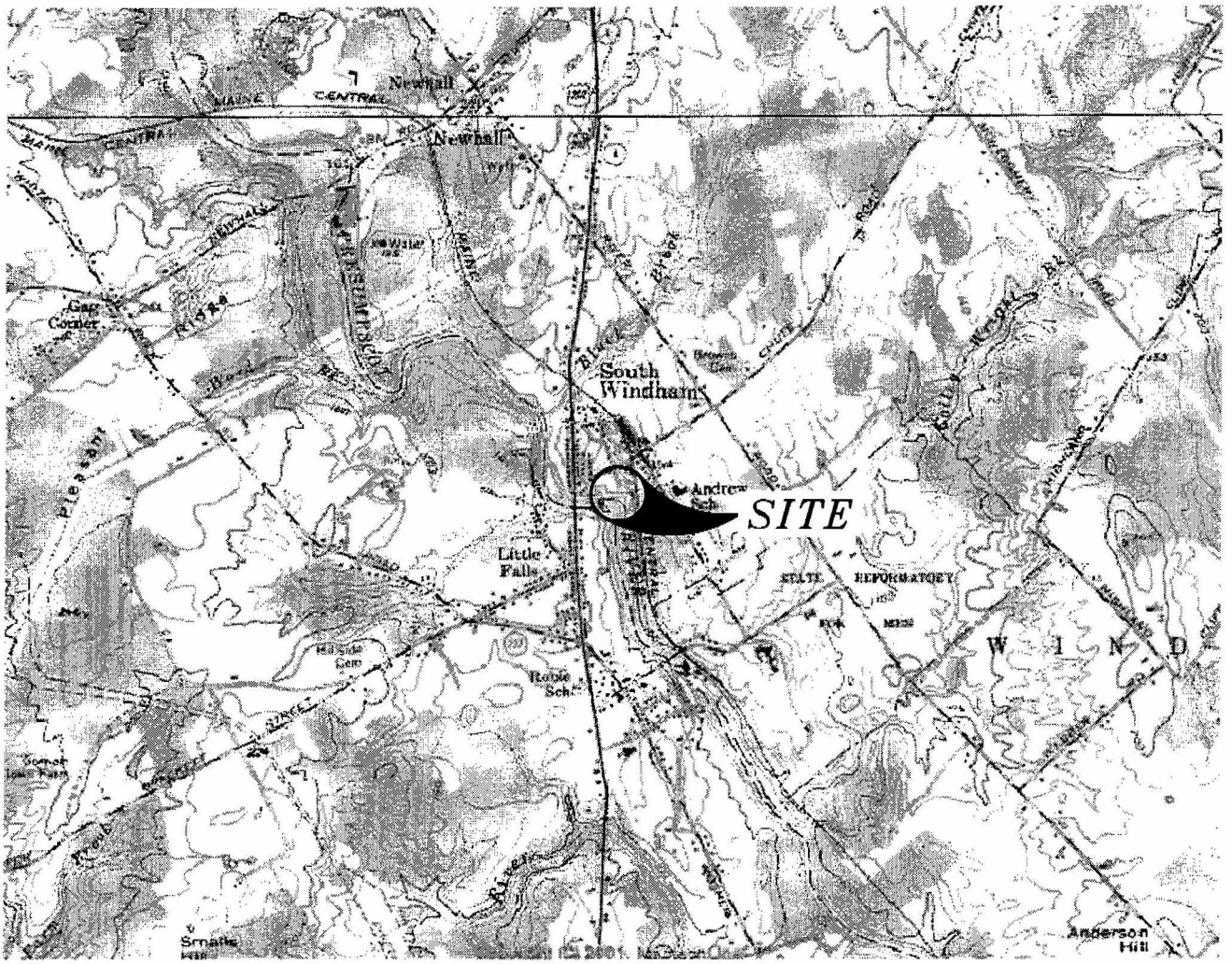
VIL_RESP05532

TABLE 1: PCB Sample Results
Interior of Keddy Mill
South Windham, Maine

	Sample Identifier	SS6	SS7	SS8	SS9	SS10
	Sample Type	Soil/Solids	Sludge/Solids	Sludge/Solids	Sludge/Solids	Sludge/Solids
	Location	Ground floor - floor sump	1st floor	1st floor, Maintenance Shop	1st floor, Maintenance Shop	1st floor
	Result Units	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
PCBs	Collection Date	25-Nov-03	25-Nov-03	25-Nov-03	25-Nov-03	25-Nov-03
Aroclor-1016		< 48.2	< 33.1	< 54.6	**3.2**	< 43.9
Aroclor-1221		< 48.2	< 33.1	< 54.6	< 47.6	< 43.9
Aroclor-1232		< 48.2	< 33.1	< 54.6	< 47.6	< 43.9
Aroclor-1242		< 48.2	< 33.1	< 54.6	< 47.6	< 43.9
Aroclor-1248		< 48.2	< 33.1	< 54.6	< 47.6	< 43.9
Aroclor-1254		120	13	11	10	5.1
Aroclor-1260		54	< 33.1	< 54.6	3.5	< 43.9
PCB Total		**174**	**13**	**11**	**16**	**5**

Notes:
NA = Not available
µg = microgram
mg/kg = milligram per killigram
MDEP = Maine Department of Environmen
PCBs = Polychlorinated Biphenyls
Bold values indicate exceedance of guideli
J = Estimated value

FIGURES



TAKEN FROM U.S.G.S. 7.5x15 MINUTE SERIES TOPOGRAPHIC MAP OF GORHAM, NAINE DATED 1975

CONTOUR INTERVAL IS 3 METERS

SITE COORDINATES: LATITUDE 43°44'06"
LONGITUDE 70°25'32"

UTM COORDINATES: 48: 43: 165mN
03: 85: 220mE

N
W E
S

QUADRANGLE LOCATION

0 1000 2000 3000 4000

SCALE in FEET
1: 25,000

RANSOM Environmental Consultants, Inc.

SITE LOCATION MAP

PREPARED FOR:	SITE:	DATE: JUNE 2005
RENEE LEWIS PORTLAND, MAINE	7 AND 13 DEPOT STREET WINDHAM, MAINE	PROJECT: 046016 FIGURE: 1

P:\ME-DWGS\2004\046016\046016OO.dwg

VIL_RESP05535

APPENDIX A

Certification

Certification

The undersigned, as owner of the property where the cleanup site is located and the party conducting the cleanup, hereby certifies that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at the cleanup site, are on file and available for EPA inspection at:

Ransom Environmental Consultants, Inc.
400 Commercial Street, Suite 404
Portland, Maine 04101

Signature

Manager, Village at Little Falls, LLC

Title

11/22/05

Date

VIL_RESP05537

APPENDIX B

Laboratory Data Sheets

Pace Analytical®
www.pacelabs.com

Pace Analytical Services, Inc.
5203 Triangle Lane
Export, PA 15632
Phone: 724.733.1161
Fax: 724.327.7793

Ms. Lisa Haines
Ransom Environmental Consultants, Inc.
400 Commercial Street
Suite 404
Portland, ME 04101

Client Site: Keddy Mill
Client Ref.: 046016

Lab Project ID: **05-6344**
Lab Sample ID: **0511-0761**
Client Sample ID: IS-09
Sample Matrix: Solid

Date Sampled: 11/02/2005
Date Received: 11/03/2005

Inorganic Extraction

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Percent Solids	% Solids	68	N/A	%	JRC	11/10/2005	N/A	N/A

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	8082[1]	<1.0	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1221	8082[1]	<1.0	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1232	8082[1]	<1.0	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1242	8082[1]	<1.0	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1248	8082[1]	2.2	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1254	8082[1]	3.6	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1260	8082[1]	<1.0	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
PCB Total-TCL	8082[1]	5.8	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0

[1] U.S. Environmental Protection Agency, 1996, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC.

Sample Comments: Results reported in dry weight equivalence.

Pace Analytical®
www.pacelabs.com

Pace Analytical Services, Inc.
5203 Triangle Lane
Export, PA 15632
Phone: 724.733.1161
Fax: 724.327.7793

Ms. Lisa Haines
Ransom Environmental Consultants, Inc.
400 Commercial Street
Suite 404
Portland, ME 04101

Client Site: Keddy Mill
Client Ref.: 046016

Lab Project ID: **05-6344**
Lab Sample ID: **0511-0762**
Client Sample ID: IS-11
Sample Matrix: Solid

Date Sampled: 11/02/2005
Date Received: 11/03/2005

Inorganic Extraction

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Percent Solids	% Solids	97	N/A	%	JRC	11/10/2005	N/A	N/A

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	8082[1]	<3.4	3.4	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1221	8082[1]	<3.4	3.4	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1232	8082[1]	<3.4	3.4	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1242	8082[1]	<3.4	3.4	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1248	8082[1]	15	3.4	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1254	8082[1]	39	3.4	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1260	8082[1]	15	3.4	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
PCB Total-TCL	8082[1]	69	3.4	mg/kg	RDJ	11/10/2005	0044325-1	<1.0

[1] U.S. Environmental Protection Agency, 1996, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC.

Sample Comments: Results reported in dry weight equivalence. Surrogates were diluted out for Aroclor sample 11-0762.

Pace Analytical®
www.pacelabs.com

Pace Analytical Services, Inc.
5203 Triangle Lane
Export, PA 15632
Phone: 724.733.1161
Fax: 724.327.7793

Ms. Lisa Haines
Ransom Environmental Consultants, Inc.
400 Commercial Street
Suite 404
Portland, ME 04101

Client Site: Keddy Mill
Client Ref.: 046016

Lab Project ID: **05-6344**
Lab Sample ID: **0511-0763**
Client Sample ID: IS-14
Sample Matrix: Solid

Date Sampled: 11/02/2005
Date Received: 11/03/2005

Inorganic Extraction

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Percent Solids	% Solids	64	N/A	%	JRC	11/10/2005	N/A	N/A

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	8082[1]	<5.2	5.2	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1221	8082[1]	<5.2	5.2	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1232	8082[1]	<5.2	5.2	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1242	8082[1]	<5.2	5.2	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1248	8082[1]	<5.2	5.2	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1254	8082[1]	27	5.2	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1260	8082[1]	<5.2	5.2	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
PCB Total-TCL	8082[1]	27	5.2	mg/kg	RDJ	11/10/2005	0044325-1	<1.0

[1] U.S. Environmental Protection Agency, 1996, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC.

Sample Comments: Results reported in dry weight equivalence. Surrogates were diluted out for Aroclor sample 11-0763.

Pace Analytical®
www.pacelabs.com

Pace Analytical Services, Inc.
5203 Triangle Lane
Export, PA 15632
Phone: 724.733.1161
Fax: 724.327.7793

Ms. Lisa Haines
Ransom Environmental Consultants, Inc.
400 Commercial Street
Suite 404
Portland, ME 04101

Client Site: Keddy Mill
Client Ref.: 046016

Lab Project ID: **05-6344**
Lab Sample ID: **0511-0764**
Client Sample ID: IS-13
Sample Matrix: Solid

Date Sampled: 11/02/2005
Date Received: 11/03/2005

Inorganic Extraction

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Percent Solids	% Solids	67	N/A	%	JRC	11/10/2005	N/A	N/A

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	8082[1]	<1.0	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1221	8082[1]	<1.0	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1232	8082[1]	<1.0	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1242	8082[1]	<1.0	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1248	8082[1]	2.0	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1254	8082[1]	2.9	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1260	8082[1]	<1.0	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
PCB Total-TCL	8082[1]	4.9	1.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0

[1] U.S. Environmental Protection Agency, 1996, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC.

Sample Comments: Results reported in dry weight equivalence.

Pace Analytical®
www.pacelabs.com

Pace Analytical Services, Inc.
5203 Triangle Lane
Export, PA 15632
Phone: 724.733.1161
Fax: 724.327.7793

Ms. Lisa Haines
Ransom Environmental Consultants, Inc.
400 Commercial Street
Suite 404
Portland, ME 04101

Client Site: Keddy Mill
Client Ref.: 046016

Lab Project ID: **05-6344**
Lab Sample ID: **0511-0765**
Client Sample ID: IWD-02
Sample Matrix: Solid

Date Sampled: 11/02/2005
Date Received: 11/03/2005

Inorganic Extraction

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Percent Solids	% Solids	93	N/A	%	JRC	11/10/2005	N/A	N/A

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	8082[1]	<7.0	7.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1221	8082[1]	<7.0	7.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1232	8082[1]	<7.0	7.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1242	8082[1]	71	7.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1248	8082[1]	<7.0	7.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1254	8082[1]	34	7.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
Aroclor-1260	8082[1]	<7.0	7.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0
PCB Total-TCL	8082[1]	100	7.0	mg/kg	RDJ	11/10/2005	0044325-1	<1.0

[1] U.S. Environmental Protection Agency, 1996, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC.

Sample Comments: Results reported in dry weight equivalence. Surrogates were diluted out for Aroclor sample 11-0765.

REPORT OF LABORATORY ANALYSIS

VIL_RESP05543

Pace Analytical®
www.pacelabs.com

Pace Analytical Services, Inc.
5203 Triangle Lane
Export, PA 15632
Phone: 724.733.1161
Fax: 724.327.7793

Ms. Lisa Haines
Ransom Environmental Consultants, Inc.
400 Commercial Street
Suite 404
Portland, ME 04101

Client Site: Keddy Mill
Client Ref.: 046016

Lab Project ID: **05-6238**
Lab Sample ID: **0510-3449**
Client Sample ID: IW-01
Sample Matrix: Wipe

Date Sampled: 10/27/2005
Date Received: 10/28/2005

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	608[1]	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1221	608[1]	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1232	608[1]	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1242	608[1]	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1248	608[1]	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1254	608[1]	24	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1260	608[1]	17	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
PCB Total-TCL	608[1]	43	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0

[1] U.S. Environmental Protection Agency, 1982, Test Methods, Methods for Organic Chemical Analysis of Municipal and Industrial Wastewater, J.E. Longbottom and J.J. Lichtenberg, eds., EPA-600/4-82-057, Environmental Monitoring and Support Laboratory, Cincinnati, Ohio.

Sample Comments: Results reported on an as received basis. 608 Aroclor Analysis: Sample 10-3449 contains Aroclor 1254 at 23.8 ug, Aroclor 1242 at 3.14 ug (which is below the 1.0 ug detection limit) and Aroclor 1260 at 16.5 ug. Together, the total Aroclor result is 43.44 ug.

REPORT OF LABORATORY ANALYSIS

VIL_RESP05544

Pace Analytical®
www.pacelabs.com

Pace Analytical Services, Inc.
5203 Triangle Lane
Export, PA 15632
Phone: 724.733.1161
Fax: 724.327.7793

Ms. Lisa Haines
Ransom Environmental Consultants, Inc.
400 Commercial Street
Suite 404
Portland, ME 04101

Client Site: Keddy Mill
Client Ref.: 046016

Lab Project ID: **05-6238**
Lab Sample ID: **0510-3450**
Client Sample ID: IW-02
Sample Matrix: Wipe

Date Sampled: 10/27/2005
Date Received: 10/28/2005

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	608(1)	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1221	608(1)	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1232	608(1)	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1242	608(1)	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1248	608(1)	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1254	608(1)	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1260	608(1)	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
PCB Total-TCL	608(1)	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0

(1) U.S. Environmental Protection Agency, 1982, Test Methods, Methods for Organic Chemical Analysis of Municipal and Industrial Wastewater, J.E. Longbottom and J.J. Lichtenberg, eds., EPA-600/4-82-057, Environmental Monitoring and Support Laboratory, Cincinnati, Ohio.

Sample Comments: Results reported on an as received basis.

REPORT OF LABORATORY ANALYSIS

VIL_RESP05545

Pace Analytical®
www.pacelabs.com

Pace Analytical Services, Inc.
5203 Triangle Lane
Export, PA 15632
Phone: 724.733.1161
Fax: 724.327.7793

Ms. Lisa Haines
Ransom Environmental Consultants, Inc.
400 Commercial Street
Suite 404
Portland, ME 04101

Client Site: Keddy Mill
Client Ref.: 046016

Lab Project ID: **05-6238**
Lab Sample ID: **0510-3451**
Client Sample ID: IW-03
Sample Matrix: Wipe

Date Sampled: 10/27/2005
Date Received: 10/28/2005

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	608(1)	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1221	608(1)	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1232	608(1)	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1242	608(1)	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1248	608(1)	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1254	608(1)	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
Aroclor-1260	608(1)	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0
PCB Total-TCL	608(1)	<5.0	5.0	ug	RDJ	11/02/2005	0044177-1	<5.0

(1) U.S. Environmental Protection Agency, 1982, Test Methods, Methods for Organic Chemical Analysis of Municipal and Industrial Wastewater, J.E. Longbottom and J.J. Lichtenberg, eds., EPA-600/4-82-057, Environmental Monitoring and Support Laboratory, Cincinnati, Ohio.

Sample Comments: Results reported on an as received basis.

REPORT OF LABORATORY ANALYSIS

VIL_RESP05546

Pace Analytical®
www.pacelabs.com

Pace Analytical Services, Inc.
5203 Triangle Lane
Export, PA 15632
Phone: 724.733.1161
Fax: 724.327.7793

Ms. Lisa Haines
Ransom Environmental Consultants, Inc.
400 Commercial Street
Suite 404
Portland, ME 04101

Client Site: Keddy Mill
Client Ref.: 046016

Lab Project ID: 05-6238
Lab Sample ID: 0510-3452
Client Sample ID: IWD-01
Sample Matrix: Solid

Date Sampled: 10/27/2005
Date Received: 10/28/2005

Inorganic Extraction

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Percent Solids	% Solids	73	N/A	%	JRC	11/09/2005	N/A	N/A

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	8082[1]	<2.2	2.2	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1221	8082[1]	<2.2	2.2	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1232	8082[1]	<2.2	2.2	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1242	8082[1]	17	2.2	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1248	8082[1]	<2.2	2.2	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1254	8082[1]	12	2.2	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
Aroclor-1260	8082[1]	7.9	2.2	mg/kg	RDJ	11/10/2005	0044258-1	<1.0
PCB Total-TCL	8082[1]	37	2.2	mg/kg	RDJ	11/10/2005	0044258-1	<1.0

[1] U.S. Environmental Protection Agency, 1996, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC.

Sample Comments: Results reported in dry weight equivalence. 8082 Aroclor Analysis: The surrogates are diluted out.

REPORT OF LABORATORY ANALYSIS

VIL_RESP05547

Pace Analytical®
www.pacelabs.com

Pace Analytical Services, Inc.
5203 Triangle Lane
Export, PA 15632
Phone: 724.733.1161
Fax: 724.327.7793

Ms. Lisa Haines
Ransom Environmental Consultants, Inc.
400 Commercial Street
Suite 404
Portland, ME 04101

Client Site: Keddy Mill
Client Ref.: 046016

Lab Project ID: 05-6238
Lab Sample ID: 0510-3453
Client Sample ID: IS-01
Sample Matrix: Solid

Date Sampled: 10/27/2005
Date Received: 10/28/2005

Inorganic Extraction

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Percent Solids	% Solids	74	N/A	%	JRC	11/09/2005	N/A	N/A

Pesticides/PCB

Test	Method	Result	Reporting Limit	Units	Analyst	Analysis Date	Method Blank ID	Blank Result
Polychlorinated Biphenyls, ECD								
Aroclor-1016	8082[1]	<4.5	4.5	mg/kg	RDJ	11/08/2005	0044258-1	<1.0
Aroclor-1221	8082[1]	<4.5	4.5	mg/kg	RDJ	11/08/2005	0044258-1	<1.0
Aroclor-1232	8082[1]	<4.5	4.5	mg/kg	RDJ	11/08/2005	0044258-1	<1.0
Aroclor-1242	8082[1]	<4.5	4.5	mg/kg	RDJ	11/08/2005	0044258-1	<1.0
Aroclor-1248	8082[1]	<4.5	4.5	mg/kg	RDJ	11/08/2005	0044258-1	<1.0
Aroclor-1254	8082[1]	89	4.5	mg/kg	RDJ	11/08/2005	0044258-1	<1.0
Aroclor-1260	8082[1]	<4.5	4.5	mg/kg	RDJ	11/08/2005	0044258-1	<1.0
PCB Total-TCL	8082[1]	89	4.5	mg/kg	RDJ	11/08/2005	0044258-1	<1.0

[1] U.S. Environmental Protection Agency, 1996, Test Methods for Evaluating Solid Waste, SW-846, 3rd ed., Office of Solid Waste and Emergency Response, Washington, DC.

Sample Comments: Results reported in dry weight equivalence. 8082 Aroclor Analysis: The surrogates are diluted out. The spike is diluted out of the MS and MSD performed on this sample. Recovery in the LCS is within limits.